

for the BLM-administered lands identified within the project area are VRM classes III and IV (Klamath Falls RMP/ROD page 43-44). A VRM visual contrast simulation needs to be performed to determine if there are opportunities to reduce impacts to scenic and aesthetic resources. For VRM class III lands, management activities may attract attention but should not dominate the view of the casual observer. For VRM class IV lands, every attempt should be made to minimize the impact of activities through careful location, minimal disturbance and repeating the basic elements found within the landscape.

P5 The Department recommends planting fast growing hybrid poplar trees along West Langell Valley road, prior to project construction, for visual screening purposes as part of the revegetation plan mentioned on page 3.4-17. Opportunities may exist to design the project buildings and associated facilities to better match nearby ranch and dairy farm facilities. Careful selection and placement of buildings and color utilization should be considered to compliment nearby farm and ranch structures. These efforts would help to better “fit” this project into its rural setting.

R5 This document also needs to analyze the visual effect of the smoke/steam plume. If there truly will not be any smoke or steam plume (based on project redesign), this should be clearly explained in the document in Chapters 2 and 3.

S5 Page 3.8-5, Cumulative Impacts: Have additional electric transmission lines other than of the projects listed on Table 3.7-9 been proposed in proximity to the proposed project? If other specific proposals are known, they should be described and analyzed here as well as in the cumulative impact analysis sections for other resource values discussed in the document.

This section states that the “proposed facility would not have any adverse effect on aesthetic or scenic resources,” yet elsewhere the document readily acknowledges that most structures and the smoke plume would be visible from many locations. This constitutes an adverse visual impact. It may be appropriate to state that the facility would have no significant adverse impact on visual resources, but to state there would be no impact at all is inappropriate.

W5 Page 3.8-7, Table 3.8-1: Information related to Alkali Lake and Yainax Butte needs to be added to the end of this table. Refer to our comment above for Pages 3.8-1 and 3.8-2, Sections 3.8.1 and 3.8.2, for additional information.

✓5 Page 3.8-9, Figure 3.8-1; Page 3.8-11, Figure 3.8-2: It is not clear what the three black circles on these figures represent. Based on the discussion on page 3.8-3, under Impact 3.8.1, it appears they have something to do with “three sets of visual analyses” that were performed, but that still doesn’t tell the reviewer what the symbols mean.

W5 The label, “Tule Lake (BLM),” should be removed from the figures. There is no such place. Also, the Gerber Reservoir Recreation Site is shown as a county site, but is actually a BLM site (the font color and size don’t match the legend for BLM). Finally, The Klamath Wild & Scenic River designation only goes as far south as Oregon/California state line.



- X5 Page 3.8-11, Figure 3.8-3: The Preliminary DEIS contained a figure not included here in the DEIS. That was Figure 3.8-3, which attempted to show the visual effect of the smoke plume. It seems likely the smoke plume would be visible from a wide variety of locations within and outside of the project area. In fact, this plume may be more visible than many other project features. This constitutes a visual impact that the document no longer attempts to address, and the Department recommends reinserting this information into the FEIS.
- Y5 Page 3.9-1, Cultural Resources: Paragraph three, the last sentence, should be broken into two sentences. As it reads now, its meaning is not clear.
- 25 Page 3.9-4, Current Investigations: The Department recommends ensuring all appropriate tribal communities that may be impacted by the project are contacted.
- 28A6 Page 3.9-5, Impact 3.9.1, Assessment of Impact: "Klamath Tribe" should be "Klamath Tribes," in the second line of the second paragraph.
- BC Page 3.9-5, Cumulative Impacts: This section needs a discussion on the visual impacts to religious/spiritual sites located on Bryant Mountain. This issue was brought up by a number of respondents from the Klamath Tribes during the preparation of the ethnographic study of the project area. This discussion could instead be included in Section 3.8, Visual Quality and Aesthetics (pages 3.8-1 thru 3.8-7).
- CC Page 3.10-4, Electric Transmission Line: The last sentence in the paragraph states that "existing access roads would cover an additional 8.8 acres located outside of the 154-foot-wide easement." This appears to be the first location in the document where impacts to existing roads is mentioned. This project component should be added to the project description in Section 2.3.2, Electric Transmission Line, around pages 2-11 or 2-12. Based on the units on this page (i.e., acres) and the units on Page 3.4-16 (i.e., miles) it appears that the road use impacts for existing roads is 1.8 acres/mile, while road use impacts for new roads is 6.5 acres/mile. The Department recommends clarifying the large difference in impacts.
- DO Page 3.10-5, Plans and Policies: This section states "No Federal land use management plan is applicable to the Facility." This statement is incorrect assuming that "the Facility" includes the main power facility, transmission lines, access roads, and other project features. The proposed action must comply with the BLM's Klamath Falls Resource Area Record of Decision and Resource Management Plan with respect to location of new right-of-ways. The Department recommends either referencing the text insert provided in relation to the "land use plans and policies" section of the summary (Page S-7), or place that same text insert in this section of the document.
- EV Page 3.10-17, Cumulative Impacts: This section should also address the potential cumulative effects that the proposed pumped storage power plant in the Bryant Mountain area, and other projects described in Sections 2.4, may have on land uses and policies.



K6 Page 3.11-1, Socioeconomics: The Klamath Falls population of 19,462 is substantially lower than the population of the Klamath Falls Urban Growth Boundary, which encompasses an area approximately 2.5 times larger than the Klamath Falls city boundary. The FEIS should discuss the population within the entire Urban Growth Boundary. It is unclear if the population estimates for Bonanza and Malin are limited to just those living within city boundaries or if they include surrounding unincorporated areas. The population of Merrill is not included in this section, but is included in the discussion under Section 3.11.1.1.

Page 3.11-1, Population: See comment related to section 3.11 Socioeconomics.

Page 3.11-2, Housing: See comment related to section 3.11 Socioeconomics.

GL 3.11-2, Environmental Consequences and Mitigation Measures: This proposed project could have significant impacts on the community of Bonanza, Oregon, especially during the construction phase. The Department suggests you address the impacts to the local community and its businesses and identify any infrastructure improvements or business opportunities that need to be provided. It is also important to note that existing drinking water in many wells in Bonanza are contaminated.

H6 Page 3.11-4, Impact 3.11.3, Assessment of Impact: The second and third paragraphs on this page state that the "influx of construction workers...would not create a substantial burden on available housing in the project area...." Section 3.11.1.3, Housing, notes that housing within Merrill, Malin, and Bonanza makes up a small percentage of the total housing in Klamath County. It stands to reason that little vacant housing is available in these communities to accommodate the increased temporary and permanent workforce. Therefore, impacts on housing, services, and infrastructure within these small communities (particularly Bonanza) during and after construction appear to be understated. If it is assumed that most of the construction and operational workforce will move to, or commute from, the Klamath Falls area. It is not clear how this conclusion was reached and this should be more thoroughly described in the FEIS.

IL6 Page 3.12-2, Water Supply: The second paragraph states that water in the Bonanza area is provided by private wells in the shallow aquifer. This section needs to note that these water sources are, under certain conditions, contaminated by Big Butte Springs, and as such, there are times of the year where there is no safe, potable water available.

JL6 Page 3.12-3, Solid Waste, Landfills: With reference to the second paragraph, last sentence, since the Klamath Falls landfill ceased to accept household waste in early 2004, this section needs to be revised. The EIS needs to describe the impacts, and identify where the waste will be taken.

K6 Page 3.12-6, Environmental Consequences and Mitigation Measures: The Department recommends describing that local water sources are contaminated by Big Butte Springs, in the third paragraph.



116 Page 3.12-7, Impact 3.12.1, Water: Though the project may not significantly impact the shallow aquifer system or any public or community water system in the area, as stated in the second paragraph, Bonanza lacks a safe, potable water source at certain times of the year, as noted in the comment on water supply above. The FEIS should consider the feasibility of providing potable water to Bonanza as a possible community service.

116 Page 3.12-13, Table 3.12-1: Much of the water supply of Bonanza, which comes from private wells, is contaminated. This should be noted in this table.

116 Page 3.13-1, Health and Safety: Section 2.3.2 discussed vegetation control needs, including the use of chemical methods. Other parts of the DEIS discuss the need to develop and implement an integrated noxious weed management plan. This section of the document needs to include a discussion of which chemicals are proposed for use, and describe how they would be applied, along with any proposed mitigation methods that would be employed to protect human health and safety.

06 Page 4-1, Endangered and Threatened Species and Critical Habitat: The second paragraph lists bald eagles as the only species involved in the consultation process. The biological assessment (Appendix C) also lists the Lost River and shortnose suckers as occurring in the vicinity of the proposed project. These two species should be listed in this section as well.

76 Page 4-4, Recreation Resources: There is no discussion of recreation and tourism impacts or potential mitigation measures in Chapter 3. Minimal attention to recreation values are given in the discussion in section 4.10. While it may be true that there are no significant recreation facilities on the lands directly impacted by the project features, there are significant recreational values on public lands (BLM, Forest Service, County, and State) surrounding, or within sight of, the proposed facilities. There is a substantial amount of dispersed recreation that occurs in southern Klamath County in the vicinity of the project area including, but not limited, to activities such as hunting, hiking, off-road vehicle use, and sight-seeing that may be affected by the proposed project and needs to be analyzed in detail within Chapter 3. Impacts to public access and associated recreation opportunities and appropriate mitigation measures need to be determined. Opportunities to enhance local tourism through interpretation and environmental education efforts may exist. Guided tours and interpretive facilities of the project should be considered. Some of these potential impacts tie in directly with the visual or aesthetic impact of the facilities and the air pollution plume that will be visible from surrounding lands.

116 Page 6-2, State Agencies: The Oregon Department of Environmental Quality, Klamath Falls office, should be provided a copy of this document, in order to review and comment on the air quality sections.

56 Page 6-2, State Agencies: The Burns District Area Office is a federal agency, not a state agency, and the address has changed to:

BLM - Burns District  
28910 Highway 20 W  
Hines, OR 97738